



Equal Employment Opportunity, Non-Discrimination, Anti-Harassment, and Anti-Retaliation Policy

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This policy/notice is not a contract and may be updated from time to time. NOV will inform you of each update by either e-mail, the NOV intranet - <http://inside.nov.com> or through your local Human Resources representative.

NON-DISCRIMINATION POLICY STATEMENT

National Oilwell Varco (NOV) is an equal opportunity employer and expressly forbids unlawful discrimination in accordance with federal, state, and local law. It is NOV policy to provide equal employment opportunities to all employees and applicants without regard to: race, color, creed, citizenship status, religion, sex, sex stereotyping, gender, sexual orientation, gender identity, gender expression, pregnancy (which includes conditions related to pregnancy, childbirth, or breastfeeding), national origin, ancestry, age, disability, marital status, genetic characteristics; participation in or anticipated participation in any federal uniformed service or other protected military service, veteran status, or any other status or activity protected by applicable law. This policy applies to all terms and conditions of employment, including, but not limited to, recruitment, hiring, placement, promotion, benefits, termination, staff reduction, recall, reassignment, transfer, leaves of absence, compensation, training, and application of NOV policy. Violation of this policy will result in disciplinary or corrective action up to and including termination.

ANTI-HARASSMENT POLICY STATEMENT

NOV complies with all applicable federal, state, and local laws prohibiting harassment in employment and is committed to providing a work environment free from intimidation and where its employees are treated with dignity and respect. For these reasons, NOV will not tolerate harassment of any kind toward employees by managers, supervisors, co-workers, customers, suppliers or visitors. Likewise, employees, regardless of their position are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur.

Harassment

NOV strictly forbids verbal, nonverbal or physical harassment that is based on actual or perceived race, color, creed, citizenship status, religion, sex, sex stereotyping, gender, sexual orientation, gender identity, gender expression, pregnancy (which includes medical conditions related to pregnancy, childbirth, or breastfeeding), national origin, ancestry, age, disability, marital status, genetic characteristics; participation in or anticipated participation in any federal uniformed service or other protected military service, veteran status, or any other status or activity protected by applicable law. Employee conduct that constitutes unlawful harassment and/or unwelcome, inappropriate conduct not sufficiently severe or pervasive to be considered unlawful harassment violates this policy. Violation of this policy will subject employees to disciplinary or corrective action up to and including termination.

For purposes of this policy, harassment is any verbal, nonverbal, or physical conduct designed to threaten, intimidate or coerce another individual and can include, but it is not limited to:

- demands, threats, epithets, jokes, derogatory or offensive language
- offensive or inappropriate pictures or objects, electronic communications or gestures
- unwelcome touching, preventing normal movement, or interference with working
- sexual favoritism



Sexual Harassment

Sexual harassment constitutes unlawful discrimination. For purposes of this policy, “sexual harassment” is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors, and other verbal, physical or visual conduct based on sex constitute unlawful sexual harassment when (1) submission to such conduct becomes an implicit or explicit term or condition of employment, (2) submission to or rejection of the conduct is used as the basis for any employment decision, or (3) the conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment.

ANTI-RETALIATION POLICY STATEMENT

NOV encourages reporting of all perceived incidents of discrimination or harassment. Under no circumstances will an employee who in good faith reports alleged incidents of discrimination, or harassment, or who cooperates in an investigation of any such report, be subjected to any form of reprisal or retaliation on account of his/her having made such report or cooperated in such investigation. NOV prohibits any form of retaliation against any employee for filing a bona fide complaint under this policy, or for assisting in a complaint investigation, or for filing an administrative claim with the EEOC or a state or local governmental agency. Any employee who feels that he or she has been subjected to such reprisal or retaliation should immediately report the incident to Human Resources. Acts of reported retaliation will be promptly investigated and addressed.

COMPLAINT PROCEDURE

An employee who believes they have been the target of or have witnessed conduct that violates this policy should immediately report the incident to his/her direct supervisor. If an employee believes it would be inappropriate or uncomfortable to discuss the matter with his/her immediate supervisor (if, for example, the supervisor is the alleged harasser or for any other reason), the complaint should be reported directly to a higher level of management, the Company’s Employee and Labor Relations Director, and/or to Human Resources. Employees should also feel free to report any perceived violations of this policy through NOV’s Ethics Hotline at 800-676-4380, <http://ethicshotline.nov.com>, or e-mail risk.mitigation@nov.com. Reports made through the Ethics Hotline must identify the alleged victim(s) and wrongdoer(s) in order to allow for an effective investigation. Reports made through the Ethics Hotline may be made anonymous.

All allegations of discrimination, harassment or retaliation will be taken seriously and will be promptly investigated in as confidential a manner as possible, although complete confidentiality cannot be guaranteed. Parties involved in the situation (including the reporting party, anyone identified as the target of the behavior (if different than the reporting party) and anyone who allegedly violated this policy will be offered an opportunity to be interviewed or to otherwise respond to a report under this policy. The Company may put certain interim measures in place, such as a leave of absence or a transfer, while the investigation proceeds. Failure to fully cooperate in such an investigation will result



in disciplinary or corrective action up to and including termination. If an investigation reveals a violation of this policy or other inappropriate conduct, then NOV will take corrective action, including discipline up to and including dismissal, reassignment, changes in reporting relationships, training, or other measures the Company deems appropriate under the circumstances, regardless of the job positions of the parties involved. Upon completion of the investigation, the employee who filed the complaint will be notified by Human Resources of the results of the investigation and, as determined appropriate under the circumstances, any actions taken.

While NOV is committed to preventing, addressing, and punishing unlawful discrimination, harassment and retaliation, it also recognizes that false accusations of discrimination, harassment or retaliation may harm an innocent party who is falsely accused. Accordingly, if, after investigating any complaint of discrimination, harassment or retaliation, NOV determines that the complaint was not brought forward in good faith and/or that an employee has purposely provided false information regarding the complaint, corrective action may be taken against the individual who filed the complaint or who gave false information up to and including termination of employment. However, if an employee makes a report of what he/she in good faith believes to be discrimination, harassment or retaliation, the employee will not be subjected to disciplinary action even if the employee turns out to have been mistaken.

Each member of management is responsible for creating an atmosphere free of unlawful discrimination and harassment and for reporting any instances of unlawful discrimination, harassment or retaliation to the Company's Employee and Labor Relations Director in addition to Human Resources. Any manager or supervisor who receives a complaint of a violation of this policy should immediately report the matter to the Company's Employee and Labor Relations Director in addition to Human Resources. The employee may be requested but not required to put his/her complaint in writing. All complaints of violations of this policy, whether in writing or not, will be promptly investigated.

AMERICANS WITH DISABILITIES ACT (ADA) POLICY STATEMENT

It is the policy of NOV to comply with the regulations and requirements of the Americans with Disabilities Act of 1990, as amended, and state and local law. Accordingly, NOV prohibits discrimination against qualified individuals with disabilities regarding recruitment, hiring, placement, promotion, benefits, termination, staff reduction, recall, reassignment, transfer, leaves of absence, compensation, training, and application of NOV policy.

If NOV can reasonably accommodate an applicant with a disability without creating an undue hardship or causing a direct threat to workplace safety, he or she will be given the same consideration for employment as any other applicant. Further, if a qualified employee with disabilities requests an accommodation, NOV will engage in an informal interactive process to reasonably accommodate the employee so that he or she can perform the essential functions of a job; unless doing so causes undue hardship to NOV or the accommodation causes a direct threat to the employee or others in the workplace and the threat cannot be eliminated by reasonable accommodation. Please note, the resulting accommodation may not be the preferred accommodation of the employee.

If an employee believes that he/she requires an accommodation, or has questions regarding the application of this policy to their situation, then the employee should contact Human Resources. Any information regarding a disability or impairment will be kept confidential and will not be disclosed except to management or supervisory staff, Human Resources, or medical providers on a need-to-know basis. If any Company policy or practice conflicts with this policy, this policy and the ADA will prevail.